

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

SILVER SLIPPER CASINO VENTURE,
LLC

Plaintiffs,

v.

GEAVONI REESE A/K/A GEAVONI M.
REESE A/K/A GEOVANI REESE, an
individual, and
JOHN DOES 1-5

Defendants.

Civil Action No.: 18-0100

FILED

MAY 17 2018

KAREN LADNER RUHR
CIRCUIT CLERK, HANCOCK CO.
BY *[Signature]* D.C.

AMENDED COMPLAINT

Plaintiff Silver Slipper Casino Venture, LLC (collectively, "Silver Slipper") states for its Amended Complaint against Defendant Geavoni Reese a/k/a Geavoni M. Reese a/k/a Geovani Reese ("Reese") as follows:

PARTIES

1. Silver Slipper Casino Venture, LLC ("Silver Slipper") is a Delaware limited liability company with its principal place of business in Bay Saint Louis, Mississippi.
2. Geavoni Reese a/k/a Geavoni M. Reese a/k/a Geovani Reese ("Reese") is an individual resident of Mississippi who can be served with process at 112 Cambridge Drive, Waveland, Mississippi 39576.
3. John Does 1-5 are currently unknown persons having liability for the injury and damages described herein, reasonably believed to be residents of Mississippi or Louisiana, who will be named when identified with specificity, including, but not limited to, any person who conspired or assisted with perpetrating the scheme designed to defraud Silver Slipper.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this matter pursuant to Miss. Code Ann. § 9-7-81 and venue is proper in this Court pursuant to Miss. Code Ann § 11-11-3.

FACTS

5. Prior to her termination on or about October 7, 2017, Reese was employed with Silver Slipper as a Slot Floor Person.

6. As part of her employment with Silver Slipper in this capacity, Reese was tasked with monitoring areas of the casino floor, responding to customers reporting issues with slot machines, determining the validity of jackpots, calculating jackpot amounts that did not register on the casino's computer system, and confirmation of customer identification and completing appropriate forms associated with payouts.

7. During her training and her employment, Reese gained familiarity with Silver Slipper's systems and procedures related to slot machines, including floor video surveillance, automated slot machine operations and by-hand payout procedures that were necessary when a computer system malfunctioned.

8. She conducted a specifically calculated and escalating pattern of fraud and conversion devised to defraud Silver Slipper, by generating false "hand pay" cancelled credit payouts that did not reflect actual amounts of money won by patrons of Silver Slipper. Several of Reese's thefts were observed on video.

9. Reese was able to perpetrate her scheme to defraud Silver Slipper because she was a trusted employee with an intimate knowledge of the facility's slot and loss prevention policies and procedures.

10. Reese, with the knowledge gained as a member of the Slot Floor team engaged in a scheme of systematically falsifying "hand pay" cancelled credit payouts and absconded with payouts from Silver Slipper on a repeated basis.

11. On or about October 6, 2017, Silver Slipper was notified by a third-party patron that Reese had stolen money from the facility by keeping some number of payouts for herself. When Reese's last shift was reviewed by video surveillance personnel, her thievery was confirmed. Silver Slipper terminated Reese the next day, October 7, 2017.

12. Reese was also arrested by the Hancock County Sheriff's Department on October 30, 2017, on one charge of embezzlement and another charge of stealing from a gambling table. Reese's charges remain pending the joint investigation of the Hancock County District Attorney and the Mississippi Gaming Commission.

13. Silver Slipper has conducted a review of its historical data related to payouts during shifts Reese worked. Reports generated through Silver Slipper's management gaming system verify that Reese processed at least eighty-one (81) irregular and false transactions from January 3, 2017 through October 7, 2017, totaling losses of \$36,085.28.

14. The investigation is ongoing and the loss amount Silver Slipper has suffered due to Reese's actions continues to rise. Reese is believed to have committed her illegal activity during the entire period of time that she worked as a Slot Floor Person. Silver Slipper reserves the right to amend this pleading to include the exact amount of damages once its investigation is concluded.

COUNT I: FRAUD

15. The allegations set forth in paragraphs 1 through 14 are incorporated by reference into this Count.

16. Reese fraudulently engineered "hand pay" cancelled credit slot payouts as part of a scheme to defraud Silver Slipper.

17. Reese represented to Silver Slipper that the manual credit payouts were legitimate jackpots that did not show up in its system as a result of a slot machine malfunction.

18. Reese knew that her representations were false and she intended for Silver Slipper personnel to believe her and pay her the respective payouts for her own illegitimate profit and gain.

19. Silver Slipper relied upon Reese's fraudulent misrepresentations in making payouts to Reese.

20. As a proximate result of Reese's frauds described herein, Silver Slipper has been damaged.

21. As a result of Reese's fraudulent misrepresentations, Silver Slipper is entitled to recover damages from Reese in an amount to be determined at the trial of this matter, plus interest at the legal rate as allowed by law as well as punitive damages and its expenses of litigation, including reasonable attorney's fees.

COUNT II: CONVERSION

22. The allegations set forth in paragraphs 1 through 21 are incorporated by reference into this Count.

23. Reese has wrongfully exercised dominion or control over monies that she is aware rightfully and legally belong to Silver Slipper.

24. Reese intentionally, unlawfully and wrongfully deprived Silver Slipper of this property and continues to possess this property despite demand that it be returned.

25. Silver Slipper is entitled to the rightful and immediate possession of these funds.

26. As a result of Reese's conversion of monies, Silver Slipper is entitled to recover damages from Reese in an amount to be determined at the trial of this matter, plus interest at the legal rate as allowed by law as well as punitive damages and its expenses of litigation, including reasonable attorney's fees.

COUNT III: UNJUST ENRICHMENT

27. The allegations set forth in paragraphs 1 through 26 are incorporated by reference into this Count.

28. Reese wrongfully possesses property that in equity, good conscience and at law belongs to Silver Slipper, but Reese has refused to return the property to Silver Slipper.

29. Because Reese has been unjustly enriched, Silver Slipper is entitled to recover damages from Reese in an amount to be determined at the trial of this matter, plus interest at the legal rate as allowed by law as well as punitive damages and its expenses of litigation, including reasonable attorney's fees.

DEMAND FOR TRIAL BY JURY

30. Silver Slipper demands a trial by jury on each of its claims herein.

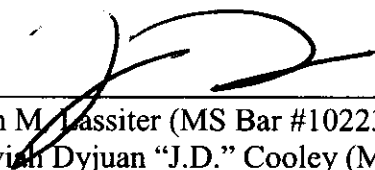
PRAYER FOR DAMAGES

WHEREFORE, PREMISES CONSIDERED, Plaintiff Silver Slipper Casino Venture, LLC demands judgment against Defendant Geavoni Reese a/k/a Geavoni M. Reese a/k/a Geovani Reese for compensatory and punitive damages in an amount to be proven at trial, along with prejudgment interest at the maximum rate allowed under applicable law, attorney's fees and costs incurred in this action, and for such other and further relief as this Court finds appropriate.

Respectfully submitted, this the 14th day of May, 2018.

SILVER SLIPPER CASINO VENTURE, LLC.

By:



John M. Lassiter (MS Bar #102235)
Jahviah Dyjuan "J.D." Cooley (MS Bar #104839)
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